

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION**

STATE OF MISSOURI ex rel. ERIC S.
SCHMITT, Attorney General, and

STATE OF LOUISIANA ex rel. JEFFREY
M. LANDRY, Attorney General,

Plaintiffs,

v.

JOSEPH R. BIDEN, JR., in his official
capacity as President of the United States, *et*
al.;

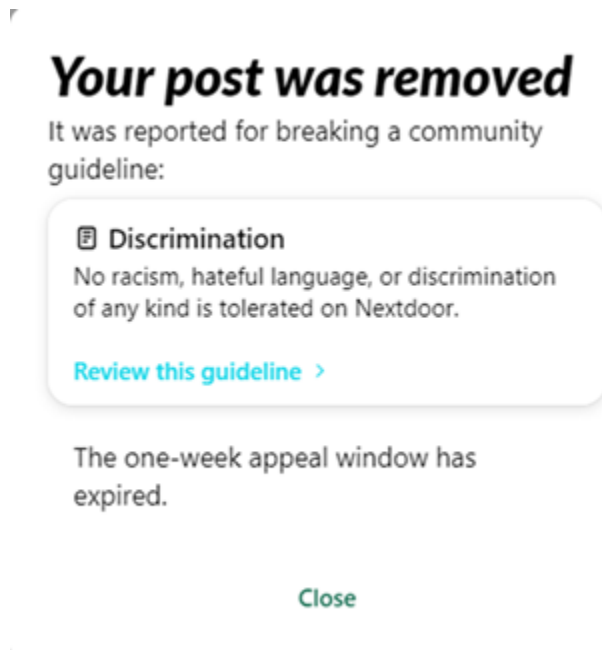
Defendants.

Case No. 3:22-cv-01213

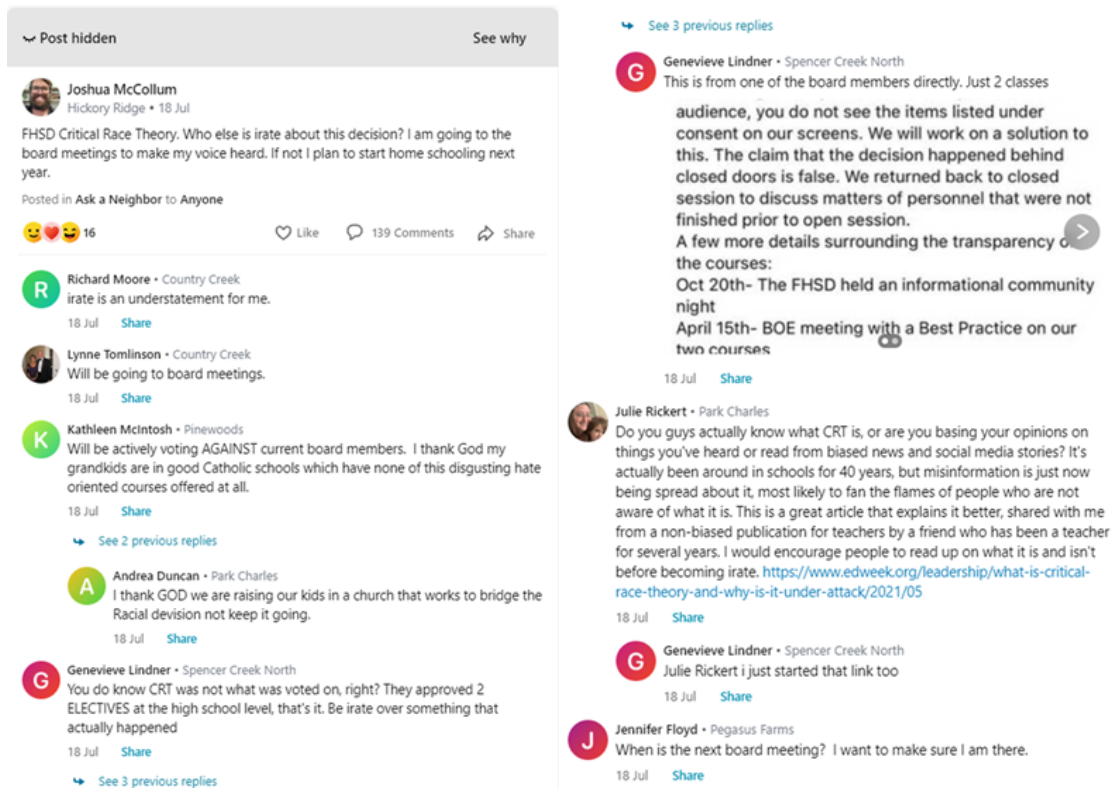
DECLARATION OF JOSHUA MCCOLLUM

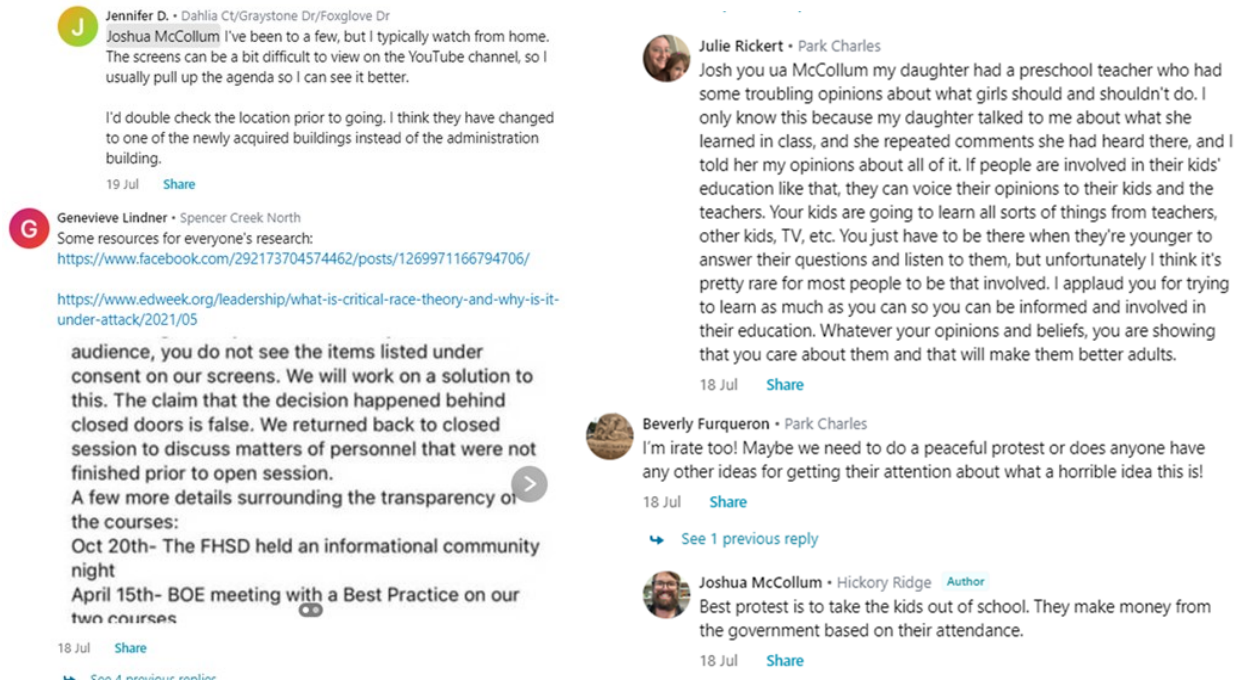
1. I, Joshua McCollum, am over the age of 18 and competent to testify to the matters asserted herein.
2. I reside in St. Charles, Missouri, in the Francis Howell School District (“FHSD”), and am a parent of school-aged children.
3. I make this declaration based on personal knowledge.
4. In July 2021, as a concerned parent of a child in the FHSD, I became aware of changes FHSD was making regarding Critical Race Theory (“CRT”). Specifically, I became concerned that the curriculum writing team at FHSD was consulting an outside expert, Dr. LaGarrett King, to write a CRT-based curriculum and was strategizing how they might bypass parent concerns and hide the content of the curriculum from parents in a push for “social justice.”
5. I posted a discussion of these issues and my concerns on the social media platform Nextdoor in July 2021.

6. Nextdoor subsequently closed down my posts due to “discrimination” or “hate speech” (below), neither of which I made in the posts.



7. In fact, I failed to notice anything that was majorly concerning in the thread (below):





8. I became aware of a video on Rumble based on content obtained from publicly available sources and Missouri Sunshine Law requests regarding footage of a Zoom meeting between Dr. King (and proponents of implementing CRT) and teachers of FHSD, which supported my concerns. My posts linking to this video were closed by Nextdoor.

9. On or about July 28, 2021, in the midst of discussing with others a recent school board meeting related to masks, and whether FHSD would keep its policy of optional masking versus change their policy to mandatory masking, I decided to launch an online petition to encourage the board members to keep their optional masking policy and *not* change to mandatory masking.

10. I posted this petition on change.org, a platform designed for online petitions, and it received as many as 280 signatures.

11. The posting of this petition on change.org was the beginning of the shadow-banning and blocking of my Nextdoor account.

12. After I started to share my online petition link on Nextdoor, I noticed that when I posted about the masking issue, I received no comments on my posts, whereas before I had been getting

comments very quickly, within five to ten minutes. I have an acquaintance who posted about the issue on his Nextdoor account, and he was receiving comments.

13. I also noticed if I posted the same link to the petition, but hid the “change.org” domain, my post would receive replies, as if Nextdoor were filtering this domain. However, shortly thereafter, my post would then be closed again within a few hours.

14. On August 6, 2021, my Nextdoor account was banned for one month due to “spreading misinformation.”

15. Subsequently, on August 12, 2021, FHSD decided to reinstate their mandatory masking policy, shortly after the voice of myself and the 280 fellow petition signers was suppressed.

16. There were petitions encouraging reinstatement of mandatory masking, but our contrary petition was suppressed by Nextdoor.

17. I am a parent simply trying to have a voice in my local school district and its policies regarding my own children, but social media has stooped down to censor even my voice within my local community.

I swear or affirm under penalty of perjury that the foregoing is true and correct.

Dated: June 8, 2022

Signed: /s/ Joshua McCollum